

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NORTH DAKOTA

In re:	)	Case No. 24-30010
	)	(Chapter 11)
RED RIVER SUBS, INC.	)	
	)	
Debtor.	)	
_____	)	

**DECLARATION IN SUPPORT OF APPLICATION TO APPROVE EMPLOYMENT OF  
MAURICE B. VERSTANDIG, ESQ. AND THE DAKOTA BANKRUPTCY FIRM AS  
GENERAL REORGANIZATION COUNSEL TO ABOVE-CAPTIONED DEBTOR**

1. My name is Maurice VerStandig, I am over the age of eighteen, and I am competent to testify to the matters set forth herein.

2. I am an attorney licensed to practice before the highest courts of the District of Columbia, the State of Nevada, the State of Maryland, the Commonwealth of Virginia, and the State of Florida; as well as before the United States District and Bankruptcy Courts for the District of North Dakota, the District of Columbia, the District of Maryland, the Eastern District of Virginia, the Western District of Virginia, the Northern District of Florida, the Middle District of Florida, the Southern District of Florida, the District of Nevada, the Western District of Wisconsin, the District of Colorado, the District of Nebraska, the Southern District of Illinois, the Central District of Illinois, the Eastern District of Oklahoma, and the Eastern District of Missouri; as well as before the Supreme Court of the United States; as well as before the United States Courts of Appeal for the District of Columbia Circuit, the Fourth Circuit, the Eleventh Circuit, and the Ninth Circuit; as well as before the United States Tax Court.

3. As was been shared with the debtor herein, prior to that entity's retention of my legal services, I am *not* a member of the State Bar Association of North Dakota, though I am admitted to practice before this Honorable Court.

4. I maintain an office in the State of Nevada together with a separate mailing address of 1452 W. Horizon Ridge Parkway, #665, Henderson, Nevada 89012 and, within the State of North Dakota, a mailing address of 1630 1<sup>st</sup> Avenue N, Suite B PMB 24, Fargo, North Dakota 58102.

5. I do *not* occupy office space in the State of North Dakota, am not a resident of the State of North Dakota, and use the foregoing address solely as a locale for the receipt of mail. I primarily reside in the State of Maine, though the majority of my bankruptcy-centric law practice is in the District of Columbia and Maryland which, in turn, leads me to travel to both locales on a regular basis.

6. I am the sole member of The Dakota Bankruptcy Firm, an entity I established for purposes of representing parties in cases in the United States Bankruptcy Court for the District of North Dakota. In my practice external to such cases, I am the sole member of The VerStandig Law Firm, LLC, a Maryland limited liability company, which houses the majority of my legal practice. The VerStandig Law Firm, LLC uses a registered trade name – The Belmont Firm – for purposes of handling debtor-side work in the Washington, DC metropolitan area.

7. I am a graduate of the University of Wisconsin-Madison (BA with honors, 2006) and the University of Miami School of Law (JD *cum laude*, 2009).

8. The majority of my legal practice is dedicated to the representation of parties in bankruptcy proceedings and related adversary cases, including (i) the representation of debtors in Chapter 11 cases; (ii) the representation of asset-based lenders in their capacity as creditors in Chapter 11 cases; (iii) the representation of consumers in Chapter 7 and Chapter 13 cases; and (iv) the periodic representation of trustees. As noted *supra*, the majority of my cases are in the United States Bankruptcy Court for the District of Columbia and the United States Bankruptcy Court for

the District of Maryland, though I also regularly appear in other bankruptcy courts and have made a conscious election to endeavor to build a practice in North Dakota.

9. I serve as a coordinating editor of the American Bankruptcy Institute Journal, have served on the Local Rules committee of the United States Bankruptcy Court for the District of Columbia since 2020, and regularly publish articles on developments in bankruptcy law.

10. I represent no other entity in connection with this case and am disinterested as that term is defined in 11 U.S.C. §101(14). I (i) am not a creditor, an equity security holder, or an insider of the Debtor; (ii) am not and was not, within two years before the date of filing of the petition for relief, a director, officer or employee of the Debtor; and (iii) do not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason. Further, I hold no interest adverse to the interest of the Debtor.

11. Excepting my representation herein and my furnishing the Debtor with bankruptcy-centric pre-filing legal advice, I have no connection with the Debtor, the Debtor's creditors, any other party in interest, their respective attorneys, the United States Trustee, or any person employed in the office of the United States Trustee.

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12. All facts contained in the application to which this declaration is affixed are true and correct to the best of my knowledge.

I, Maurice VerStandig, pursuant to Section 1746 of Title 29 of the United States Code, do hereby declare, under the penalty of perjury, that I have personal knowledge of the matters set forth herein and the foregoing are true and correct.

Dated: January 13, 2024

By: /s/ Maurice B. VerStandig  
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